# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY : CIVIL ACTION NO. MDL-875 LITIGATION (NO. VI) : Becnel 2:08-cv-84556-ER

This Document Relates to:

## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

Becnel, Gayle, et al. :

v. : Civil Action No. 3:07-cv-315-FJP-DLD

:

Anco Insulations, Inc., et al.

## AFFIDAVIT OF ALBERT L. BOSSIER, JR.

#### STATE OF LOUISIANA

#### PARISH OF JEFFERSON

BE IT KNOWN, that on the 7<sup>th</sup> day of February, 2010, personally came and appeared:

### ALBERT L. BOSSIER, JR.

Who, after being duly sworn, did depose and state the following:

- My name is Albert L. Bossier, Jr. I am over the age of twenty-one (21) and am competent to make this affidavit. I have personal knowledge of the matters stated herein and know each of them to be true and correct.
- 2. That beginning in 1957 and continuing through 1999, I was employed by Avondale Marine Ways, Inc., its successor Avondale Shipyards, Inc. and its successor Avondale Industries, Inc. and that I held the following titles during this period.

- 3. I held the positions of Vice President of Production Operations from December 9, 1968 through October 30, 1969 and Vice President of Production Operations/Executive Vice President of Production from October 30, 1969 through December 31, 1977;
- 4. I held the position of President from January 1, 1978 through June 30, 1978, President and Chief Operation Officer from June 30, 1978 through May 1, 1985, President and Chief Executive Officer from May 1, 1985 through January 3, 1986, Executive Vice President of Avondale Industries, Inc. and President and Chief Executive Officer Shipyard Division from January 3, 1986 through April 1, 1987;
- I was Chairman, President and Chief Executive Officer of Avondale Industries, Inc. from April 1, 1987 to the date of my retirement in 1999;
- 6. Avondale was at all times an employer whose employees were employed in maritime employment upon the navigable waters of the United States of America, and the adjacent bank specifically, on the west bank of the Mississippi River in Avondale, Louisiana.
- 7. Avondale was at all times engaged in the business of construction and repair of ships and other vessels.
- 8. I have reviewed the employment records of Carl S. Becnel and can conclude that during his employment with Avondale, Carl S. Becnel worked in the construction and/or repair of ships and marine vessels, including work in the maintenance of

facilities and equipment used in the construction and repair of marine vessels at Avondale.

- 9. I knew James O'Donnell personally, and worked with him at Avondale where he worked in the Avondale Safety Department where he was responsible for safety and safety inspection of ships and other vessels under construction at Avondale.
- 10. I have read this affidavit and that all statements contained herein are true and correct to the best of my knowledge, information and belief.

albert L. Bosser, Jr.

SWORN TO AND SUBSCRIBED BEFORE ME THIS DAY

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Notary Public \$ 247 69

My commission is for life.